

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

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UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

CHARLES T. LAWRENCE, JR.

Defendant,

and

LANDES PRIVE, LLC, LANDES AND  
COMPAGNIE TRUST PRIVE aka LANDES  
AND COMPAGNIE TRST PRIVE  
KB, HEKYEAH, LLC, JUSTIN D. SMITH,  
and BRENDA M. BISNER,

Relief Defendants.

**Case No. 23-cv-550-pp**

**Chief Judge Hon. Pamela Pepper**

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**AGREED MOTION TO STAY THIS MATTER AS TO CHARLES LAWRENCE**

Now Comes the Defendant, CHARLES LAWRENCE, by and through his counsel,  
Nishay K. Sanan, Esq., and moves this Court to stay these proceedings, in support thereof he  
states:

1. On or about 6/14/2023, Charles Lawrence was arraigned in the Eastern District of Wisconsin on criminal charges stemming from this matter brought by the SEC.
2. Counsel informed this Court of the charges and orally moved on the same date, during a status on this matter, to stay the proceeding as to Charles Lawrence.
3. The Government agreed to the Stay.
4. Counsel now files this written motion at the request of the court.

Wherefore, Charles Lawrence prays that this Court enter and order staying this matter until the criminal matter is resolved.

Respectfully Submitted,

/s/ Nishay K. Sanan

Nishay K. Sanan

Attorney for Defendant

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#### CERTIFICATE OF SERVICE

The undersigned, an attorney, first being duly sworn on oath, states that a copy of Motion was served upon the parties who have filed appearances in this matter, by electronically filing the same pursuant to rules of ECM on June 15, 2023.

\_\_\_\_/s/ Nishay Sanan\_\_\_\_\_